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From: Meyer, Dan
To: Jacob Odekirk
Cc: McClintock, Katie; lhiggins@cdatribe-nsn.gov
Subject: PotlatchDeltic December 3, 2019 Notice of Deviation - Minor NSR Permit R10TNSR01801 and PSD Permit R10PSD00102
Date: Wednesday, December 04, 2019 8:24:00 AM
Attachments: image008.png
image010.png
image011.png
image012.png
image013.png
image018.png

Jacob,

This email confirms that EPA Region 10 received your voicemail message from yesterday afternoon regarding your new kiln's deviation on four occasions (each for a separate batch of lumber) from compliance with the 60-minute average dry bulb temperature limit of 245°F applicable to the heated air exiting a load of lumber in any zone of the kiln. Compliance with the limit is required in both the minor NSR and PSD permits. See Condition 3.2 of the minor NSR permit and Condition 3.3 of the PSD permit. Note the typo in Condition 3.2 of the minor NSR permit which should reference Condition 4.3.6 for the monitoring, not Condition 4.4.6 (which does not exist). The permits are available online at https://www.epa.gov/caa-permitting/potlatchdeltic-land-and-lumber-llc-tribal-minor-new-source-review-nsr-air-permit and https://www.epa.gov/caa-permitting/potlatchdeltic-land-and-lumber-llc-prevention-significant-deterioration-psd-air.

I have forwarded your voicemail message to Katie McClintock in our enforcement group.

Excerpts from minor NSR permit

3.2 The highest 60-minute average dry bulb temperature of heated air exiting each load of lumber in each zone of the kiln as measured and recorded pursuant to Condition 4.4.6 shall not exceed 245°F.

3.4 The Permittee shall install, operate and maintain a computerized kiln management system to control the entire drying process.

4.3.6 Continuously measure the dry bulb temperature of the heated air that exits each load of lumber in each zone of the kiln (°F). For each load of lumber in each zone of the kiln, calculate and record an average temperature every 60 minutes using the temperature data collected by the computerized kiln management system required by Condition 3.4. Use the highest 60-minute average temperature measured during each batch to demonstrate compliance with Condition 3.2;

Excerpts from PSD permit

3.3 The highest 60-minute average dry bulb temperature of heated air exiting each load of lumber in each zone of the kiln as measured and recorded pursuant to Condition 4.1.4 shall not exceed 245°F.

3.5 The Permittee shall install, operate and maintain a computerized kiln management system to control the entire drying process.

4.1.4 Continuously measure the dry bulb temperature of the heated air that exits each load of lumber in each zone of the kiln (°F). For each load of lumber in each zone of the kiln, calculate and record an average temperature every 60 minutes using the temperature data collected by the computerized kiln management system required by Condition 3.5 over the 60-minute period. Use the highest 60-minute average temperature measured during each batch to demonstrate compliance with Conditions 3.3;

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